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UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

Jessica Kahraman, *et al.*,
Plaintiffs,

v.

State of Arizona, *et al.*,
Defendants.

Case No.: CV-22-00375-PHX-SRB

**PLAINTIFFS' UNOPPOSED
MOTION FOR LEAVE TO FILE
UNDER SEAL**

(Hon. Susan R. Bolton)

Pursuant to LRCiv. 5.6, and to this Court's April 4, 2023 Protective Order (Doc. 143), Plaintiffs moves this Court for leave to file the following Confidential information under seal in support of Plaintiffs' Response in Opposition to State Defendants Motion for Summary Judgment (Doc. 229) and supporting Controverting Statement of Facts ("CSOF") (Doc. 232).

1. Doc. 232 #7-Exhibit G- Comprehensive Child Safety Risk Assessment to CSOF.
2. Doc. 232 #14-Exhibit N- Arizona Department of Child Safety – Case Build to CSOF
3. Doc. 232 #19-Exhibit S- IV-E Training to CSOF.
4. Doc. 232 #32-Exhibit AF- Dr. Michael Kelly Financial Disclosure to CSOF.
5. Doc. 232 #33-Exhibit AG- Southwest Human Development Financial Disclosure to CSOF.
6. Doc. 232 #38-Exhibit AL- Arizona Department of Child Safety- Notes and Communications to CSOF.
7. Doc. 232 #44-Exhibit AR- Stride Psychological SVCS LLC Financial Disclosure to CSOF.
8. Doc. 232 #45-Exhibit AS- Buwalda Psychological Services Financial Disclosure to CSOF.

Pursuant to LRCiv. 5.6 (b) we set forth a clear statement of the facts and legal authority to justify filing under seal. “The compelling reasons standard applies to a motion to seal an entire pleading or portions thereof.” *Reeves v. Shinn*, No. CV-21-01183-PHX-DWL, 2022 WL 17490556 at *1 (D. Ariz. Oct. 19, 2022). “What constitutes a ‘compelling reason’ is ‘best left to the sound discretion’ of the trial court.” *Id.*, at *1 (citations omitted)

Here, the documents relate to confidential Arizona Department of Child Safety records and financial information that is subject to this Court’s Protective Order. Therefore, Plaintiffs respectfully request leave to file the Confidential Documents under seal.

The parties conferred on this matter and counsel for State Defendants have no objection to this filing.

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1 **RESPECTFULLY SUBMITTED** this 26th day of February 2025.

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CERTIFICATE OF SERVICE

I hereby certify that on February 26, 2025, I electronically transmitted the foregoing document to be filed electronically with the Clerk's Office through the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to be served on all counsel of record via the Court's CM/ECF system.

/s/ Jenny D. Jansch